

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DREW DIXON,

Plaintiff,

Case No. 1:23-cv-09878-VEC

v.

ANTONIO MARQUIS “L.A.” REID,

Defendant.

**DECLARATION OF SHAWN HOLLEY,
ESQ. IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL FOR
DEFENDANT ANTONIO MARQUIS
“L.A.” REID**

Pursuant to 28 U.S.C. § 1746, Shawn Holley, Esq. hereby declares as follows:

1. I am a member in good standing of the bar of the State of California, and am admitted *pro hac vice* in this action. I respectfully submit this declaration pursuant to Local Civil Rule 1.4 in support of the accompanying Notice of Motion and Motion to Withdraw as Counsel of Record for Defendant Antonio Marquis “L.A.” Reid in the above-captioned action.

2. I am a partner at Kinsella Holley Iser Kump & Steinsapir LLP, counsel of record for Mr. Reid. I am lead counsel for Mr. Reid, who is also represented in this action by Gregory P. Korn, Kate E. Mangels, and Suann MacIsaac of the same firm.

3. Mr. Reid was also previously represented by Bobbi C. Sternheim, Esq., who served as local counsel to my firm. On May 31, 2025, the Court entered an order granting Ms. Sternheim’s motion to be relieved as counsel for Mr. Reid.

4. There has been a breakdown in the attorney-client relationship between Mr. Reid and me, my firm, and my partners that precludes our continuing representation of him in this matter. Several months ago, Mr. Reid stopped paying my firm’s bills. My partners and I have

nevertheless continued providing services and incurring substantial additional fees and expenses in taking expert discovery, and in preparing and filing a dispositive motion and two *Daubert* motions, all with the expectation that Mr. Reid would come current on his bill. But Mr. Reid has persisted in failing to pay any of the substantial balance that is currently owed to my firm, despite repeated requests.

5. Mr. Reid has further been uncommunicative concerning his payment of attorneys' fees and costs. My firm formally wrote to Mr. Reid on May 23, 2025 to arrange for a payment of the firm's invoices and to indicate that the firm would have no choice but to withdraw if the fees were not paid. Mr. Reid failed to respond to that letter.

6. My firm, my partners, and I cannot afford to continue representing Mr. Reid without compensation.

7. All fact and expert discovery in the case is complete. A motion for summary adjudication, and *Daubert* motions to exclude Plaintiff's disclosed experts, have been filed by my firm on Mr. Reid's behalf. Financial discovery is ongoing in the case. Trial is scheduled for September 8, 2025.

8. This motion to withdraw is made after my firm and I have exhausted all efforts to obtain payment for our services, and at a point in time at which Mr. Reid will have sufficient time to engage replacement counsel for the September 8, 2025 trial.

9. I am not asserting a retaining or charging lien.

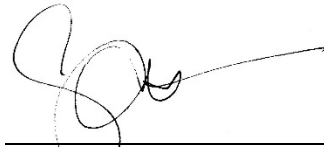
10. My firm has informed Mr. Reid of our intention to file this motion for withdrawal as counsel absent his payment of the firm's invoices, and Mr. Reid has not responded.

WHEREFORE, I request that the Court enter an Order permitting me and attorneys Gregory Korn, Kate Mangels, and Suann MacIsaac to withdraw as counsel of record for defendant Antonio Marquis “L.A.” Reid in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 9, 2025

By:

A handwritten signature in black ink, appearing to read 'Shawn Holley', written over a horizontal line.

SHAWN HOLLEY